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SONIA M. GONZALEZ

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SONIA M. GONZALEZ	)	Case No.: 2:17-cv-03118-APG-PAL
Plaintiff,	)	
v.	)	UNOPPOSED MOTION TO EXTEND
	)	TIME TO FILE MOTION FOR
NANCY A. BERRYHILL,	)	REMAND AND/OR REVERSAL
Acting Commissioner of Social	)	
Security,	)	(FIRST REQUEST)
	)	
<u>Defendant.</u>	)	

Plaintiff Sonia M. Gonzalez respectfully requests that the Court extend the time for Plaintiff to file her Motion for Reversal and/or Remand by 31 days from June 7, 2018 to July 9, 2018, with all other dates in the Court's Order Concerning Review Of Social Security Cases extended accordingly. Of Counsel for Plaintiff

1 has conferred with Defendant's counsel, who has no opposition to this motion, on  
2 June 11, 2018.

3 This is Plaintiff's first request for an extension. As the Court may be aware  
4 of Plaintiff's Of Counsel situation with other Social Security cases, Counsel's  
5 mother has been fighting a losing battle with Systemic Lupus Erythematosus that  
6 has required multiple surgeries these past two years due inflammation affecting the  
7 kidneys and lungs. On February 6, 2018, Of Counsel's mother was taken to the  
8 emergency room and was admitted to the hospital. On February 8, 2018, Of  
9 Counsel's mother had a surgery to avoid further kidney obstruction due to the  
10 Lupus inflammation and kidney infection.

11 On February 16, 2018, Of Counsel's husband's mother suffered two  
12 ischemic strokes, requiring 24-hour daily care for her activities of daily living up to  
13 present day, which Of Counsel has had to assist with. On March 28, 2018, Of  
14 Counsel's mother was advised that another kidney surgery was medically  
15 necessary. On May 8, 2018, Of Counsel's mother had the first of three procedures  
16 to her kidney. On May 25, 2018, Of Counsel's mother was informed that the  
17 kidney infection is not curable, and the first of three kidney surgeries will take  
18 place July 17, 2018.

19 On June 7, 2018 at 3:30 a.m., Of Counsel's husband suffered a micturition  
20 syncope resulting in a concussion, 17 staples to his head, and a blood transfusion.  
21 Of Counsel was in the hospital with her husband on June 7, 2018 and required her  
22 attention for 24-hour watch due to the concussion.

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1 This is not an ordinary circumstance for Of Counsel and Of Counsel  
2 sincerely apologizes to the Court for any inconvenience this may have cause.

3 .  
4 DATE: June 11, 2018

Respectfully submitted,

5 LAWRENCE D. ROHLFING

6 /s/ *Cyrus Safa*

7 BY: \_\_\_\_\_

Cyrus Safa

8 Attorney for plaintiff SONIA M. GONZALEZ

9 Of Counsel:

10 Monica Perales

11 Attorney at Law

12 DATED: June 18, 2018

13 IT IS SO ORDERED:

*Jerry A. Feen*

14 UNITED STATES MAGISTRATE JUDGE  
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**CERTIFICATE OF SERVICE  
FOR CASE NUMBER 2:17-CV-03118-APG-PAL**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on June 13, 2018.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

*/s/ Monica Perales*

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Monica Perales  
Attorneys for Plaintiff